

1 **SHANNON TAITANO, ESQ.**
2 **OFFICE OF THE GOVERNOR OF GUAM**
Ricardo J. Bordallo Governor's Complex
3 Adelup, Guam 96910
Telephone: (671) 472-8931
4 Facsimile: (671) 477-4826

5 **EDUARDO A. CALVO, ESQ.**
6 **KATHLEEN V. FISHER, ESQ.**
7 **RODNEY J. JACOB, ESQ.**
8 **DANIEL M. BENJAMIN, ESQ.**
9 **CALVO & CLARK, LLP**
Attorneys at Law
655 South Marine Corps Drive, Suite 202
10 Tamuning, Guam 96913
Telephone: (671) 646-9355
Facsimile: (671) 646-9403

11 *Attorneys for the Government of Guam*
12 *and Felix P. Camacho, Governor of Guam*

13
14 IN THE UNITED STATES DISTRICT COURT
15 DISTRICT OF GUAM

16 JULIE BABAUTA SANTOS, et. al.,
17
18 Petitioners,
19
20 -v-
21 FELIX P. CAMACHO, etc., et. al.
22 Respondents.

FILED
DISTRICT COURT OF GUAM
JUL 26 2007 mbe
MARY L.M. MORAN
CLERK OF COURT

CIVIL CASE NO. 04-00006
(Consolidated with Civil Case Nos.
04-00038 and 04-00049)

**DECLARATION OF LOURDES M.
PEREZ IN SUPPORT OF THE
GOVERNOR'S AND GOVERNMENT
OF GUAM'S REPLY IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
SETTLEMENT AND RESPONSE TO
SIMPAO PLAINTIFFS' OBJECTIONS**

23
24
25
26
27
28
ORIGINAL

1 I, Lourdes M. Perez, hereby declare and state as follows:

2 1. I am the Director of the Department of Administration ("DOA"). I make this
3 declaration on personal knowledge and based upon my knowledge of the official records on file
4 with the Department of Administration. If called as a witness, I could and would testify
5 competently as follows.

6 2. As of the end of FY 2006, the total cumulative General Fund deficit for the
7 Government of Guam is \$524,078,360 based on its audited financials.

8 3. As I certified in signing the Settlement on January 8, 2007, \$10 million of the \$90
9 million settlement payment was already in the account created pursuant to Chapters 50 and 51 of
10 11 G.C.A. Since then, as I have certified in my reports to this Court, an additional \$3,395,623.15
11 has been reserved for the Settlement as of June 30, 2007. Thus, the total amount that has been
12 reserved for the \$90 million payments stands at \$13,395,623.15 as of June 30, 2007, of which
13 \$8,233,851.46 was already paid to the Class.

14 I swear under penalty of perjury under the laws of the Territory of Guam and the United
15 States of America that the forgoing is true and correct.

16 Executed on this 26th day of July in Tamuning, Guam.

17
18
19 
20 **LOURDES M. PEREZ**